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6 The Honorable Robert S. Lasnik
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12 UNITED STATES DISTRICT COURT
13 WESTERN DISTRICT OF WASHINGTON
14 AT SEATTLE
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17 BRUCE CORKER d/b/a RANCHO ALOHA, et al.,

No. 2:19-cv-00290-RSL

18 Plaintiffs,

**DECLARATION OF TRENTON
NORRIS ON BEHALF OF
SETTLING DEFENDANTS
L&K AND KIHNE RE: NO
OBJECTION TO
SETTLEMENT FROM USAG
PER CAFA**

19 v.
20 COSTCO WHOLESALE CORPORATION, a
21 Washington corporation; et al.,
22 Defendants.

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28 DECLARATION OF TRENTON NORRIS

HPS ASSOCIATES APC
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ALISO VIEJO, CA 92627
949.474.4222

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3 DATED January 23, 2023

HPS ASSOCIATES APC
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d/b/a Magnum Coffee Roastery and Kevin
Kihne*
By s/ GREGORY M. HATTON
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EXHIBIT 1

The Honorable Robert S. Lasnik

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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATLLE

10 BRUCE CORKER d/b/a/ RANCHO
11 ALOHA, et al.,

12 Plaintiffs,

13 *v.*

14 COSTCO WHOLESALE
15 CORPORATION, a Washington
corporation, et al.,

16 Defendants.

17 Case No.: 2:19-cv-00290-RSL

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**DECLARATION OF TRENTON H.
NORRIS REGARDING NOTICE TO
FEDERAL AND STATE
OFFICIALS PURSUANT TO THE
CLASS ACTION FAIRNESS ACT**

I, Trenton H. Norris, declare as follows:

1. I am a member of the bar of the State of California and an attorney at Arnold & Porter Kaye Scholer LLP, special counsel for defendant L&K Coffee Company, LLC d/b/a Magnum Coffee Roastery (“L&K”). The facts set forth herein are of my own personal knowledge, as well as upon information provided to me by employees of Arnold & Porter Kaye Scholer LLP, and if called and sworn as a witness, I could and would competently testify thereto.

2. I directed the issuance of notice to the appropriate Federal and State officials pursuant to the Class Action Fairness Act of 2005 (“CAFA”), 28 U.S.C. § 1715(b), on behalf of L&K.

3. Notice was duly mailed on October 12, 2022, to the appropriate Federal and State officials identified in the attachment to the notice. A copy of the notice is attached hereto as Exhibit A.

4. As of the date of this Declaration, Arnold & Porter Kaye Scholer LLP has not received any inquiries or objections from any State or Federal officials related to the notice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed January 13, 2023, at San Francisco, California.

Franklin H. Egan

Trenton H. Norris

CAFA DECLARATION OF TRENTON H. NORRIS
CASE NO. 2:19-cv-00290-RSL

EXHIBIT A

Arnold & Porter

Trenton H. Norris
+1 415.471.3303 Direct
Trent.Norris@arnoldporter.com

October 12, 2022

VIA U.S. MAIL

United States Attorney General
And State Attorneys General
Identified in Attachment A

Re: CAFA Notice of Proposed Class Action Settlement,
Corker, et al. v. Costco Wholesale Corporation, et al.,
No. 2:19-cv-00290-RSL (W.D. Wash.)

Dear Counsel:

Pursuant to the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1751(b), L&K Coffee Company, LLC d/b/a Magnum Coffee Roastery (“L&K”) hereby serves notice of a proposed settlement in *Corker, et al. v. Costco Wholesale Corporation, et al.*, No. 2:19-cv-00290-RSL (the “Action”), pending in the United States District Court for the Western District of Washington (the “Court”).

A motion for preliminary approval of the proposed settlement in the Action was filed with the Court on October 3, 2022. The Court granted preliminary approval of the settlement on October 4, 2022, and scheduled a final approval hearing for February 16, 2023 at 11:00 a.m. L&K denies the allegations in the Action and denies any liability, but has decided to settle the Action solely to eliminate the burden, expense, and uncertainty of further litigation.

Copies of all materials filed in the Action are electronically available on the Court’s Pacer website found at <https://pacer.uscourts.gov/>. Additionally, pursuant to 28 U.S.C. § 1715(b), the enclosed USB flash drive contains the following documents:

1. The Original Complaint filed on February 27, 2019 [Dkt. #1], the First Amended Complaint filed on May 21, 2019 [Dkt. #81], the Second Amended Complaint filed on April 30, 2020 [Dkt. #271], and the Third Amended Complaint filed on January 8, 2021 [Dkt. #381].
2. Plaintiffs’ Motion for Preliminary Approval of Class Settlement and Memorandum in Support, filed on October 3, 2022 [Dkt. #706], and all attachments and exhibits [Dkt. #702, 703], including:

Arnold & Porter

United States Attorney General
October 12, 2022
Page 2

- a. The Settlement Agreement, fully executed on September 15, 2022;
 - b. The proposed long-form notice to class members;
 - c. The proposed publication notice to class members.
3. The Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Settlement and Directing Issuance of Notice [Dkt. # 707].
 4. List of Class Members by State.
 5. Proportionate Share of Class Members by State.

If you have any questions regarding the foregoing materials or the details of the case and settlement, please contact me directly.

Sincerely,

ARNOLD & PORTER KAYE SCHOLER LLP

By: 
Trenton H. Norris

Enclosures

Corker, et al. v. Costco Wholesale Corporation, et al., No. 2:19-cv-00290-RSL (W.D. Wash)
CAFA Notice - Attachment A - Service List

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Corker, et al. v. Costco Wholesale Corporation, et al., No. 2:19-cv-00290-RSL (W.D. Wash)
CAFA Notice - Attachment A - Service List

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Corker, et al. v. Costco Wholesale Corporation, et al., No. 2:19-cv-00290-RSL (W.D. Wash)
CAFA Notice - Attachment A - Service List

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Corker, et al. v. Costco Wholesale Corporation, et al., No. 2:19-cv-00290-RSL (W.D. Wash)
CAFA Notice - Attachment A - Service List

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on January 23, 2023, I electronically filed the preceding document
3 with the Clerk of the Court using the CM/ECF system which will send notification to the counsel
of record in this case.

4 I declare under penalty of perjury that the foregoing is true and correct, to the best of my
5 knowledge.

6 Dated January 23, 2023, at Aliso Viejo, California.

7 HPS ASSOCIATES APC
8 By: /s/ *John A. McMahon*
9 John A. McMahon, Attorney